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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION FOR LEAVE TO FILE
AMENDED LIST OF ELECTED TRADE
SECRETS, AMENDED COMPLAINT,
SUPPLEMENTAL EXPERT REPORTS
AND REVISED WITNESS AND EXHIBIT
LISTS**

I, Felipe Corredor, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of Its Motion for Leave to File Amended List of Elected Trade Secrets, Amended Complaint, Supplemental Expert Reports and Revised Witness and Exhibit Lists (“Waymo’s Motion”), filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Exhibit 1 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 2 to the Nardinelli Declaration	Entire Document	Waymo
Exhibit 3 to the Nardinelli Declaration	Entire Document	Waymo
Exhibit 4 to the Nardinelli Declaration	Entire Document	Waymo; Stroz Friedberg
Exhibit 5 to the Nardinelli Declaration	Entire Document	Waymo
Exhibit 6 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 7 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 8 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 9 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 11 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 12 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 13 to the Nardinelli Declaration	Entire Document	Defendants

Exhibit 16 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 17 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 18 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 19 to the Nardinelli Declaration	Entire Document	Defendants and/or Stroz Friedberg
Exhibit 20 to the Nardinelli Declaration	Entire Document	Anthony Levandowski
Exhibit 22 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 23 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 24 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 25 to the Nardinelli Declaration	Entire Document	Waymo; Defendants
Exhibit 28 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 29 to the Nardinelli Declaration	Entire Document	Defendants
Exhibit 30 to the Nardinelli Declaration	Entire Document	Defendants and/or Stroz Friedberg
Exhibit 31 to the Nardinelli Declaration	Entire Document	Waymo
Exhibit 33 to the Nardinelli Declaration	Entire Document	Waymo; Defendants

2. Specifically, the portions of Waymo's Motion and exhibits thereto identified in the table above as designated by Waymo contain or refer to trade secret information or confidential business information, which Waymo seeks to seal.

3. The portions of Waymo's Motion and Exhibits 1-5, 11-12, 18, 22-23, 25, 31, and 33 identified in the table above contain, reference, and/or describe Waymo's trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, including its source code, algorithms, and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to descriptions of the

1 functionality or features of Waymo's autonomous vehicle system. If such information were made
2 public, I understand that Waymo's competitive standing would be significantly harmed.

3 4. The portions of Exhibits 22 and 33 outlined in the table above contain, reference,
4 and/or describe Waymo's highly confidential and sensitive business information. The information
5 Waymo seeks to seal regards confidential details regarding Waymo's business and competition. I
6 understand that this confidential business information is maintained by Waymo as secret. The public
7 disclosure of this information would give Waymo's competitors access to Waymo's business strategy
8 for its autonomous vehicle system. If such information were made public, I understand that Waymo's
9 competitive standing would be significantly harmed.

10 5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Motion and
11 exhibits thereto that merit sealing.

12 6. Waymo only seeks to seal the portions of Waymo's Motion and exhibits thereto
13 identified in the table above as designated by Defendants and/or third parties because Waymo believes
14 such information is considered confidential or non-public by Defendants and/or those third parties.

15
16 I declare under penalty of perjury under the laws of the State of California and the United
17 States of America that the foregoing is true and correct, and that this declaration was executed in San
18 Francisco, California, on October 23, 2017.

19 By /s/ Felipe Corredor

20 Felipe Corredor
21 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven
Charles K. Verhoeven